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Attorneys for FLOWERS BAKERIES, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

KELLY ROMERO, on behalf of herself and
others similarly situated,

Plaintiff,

v.

FLOWERS BAKERIES, LLC dba
NATURE'S OWN, a Georgia limited
liability company, and DOES 1 through 50,
inclusive,

Defendant.

Case No. 5:14-cv-05189

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
FIRST AMENDED COMPLAINT**

1 Pursuant to Northern District Local Rule 6-2, Plaintiff Kelly Romero and Defendant
2 Flowers Bakeries, LLC ("Flowers"), by and through their respective attorneys, hereby stipulate as
3 follows:

4 WHEREAS, on January 2, 2015, Flowers filed a motion to dismiss the Complaint in this
5 action. (Doc. No. 13.)

6 WHEREAS, on May 6, 2015, the Court granted in part and denied in part Flower's
7 motion to dismiss, and ordered that any amended pleading shall be filed no later than June 5,
8 2015. (Doc. No. 35.)

9 WHEREAS, the parties agree that an extension of time to file Ms. Romero's First
10 Amended Complaint is warranted and would be efficient because: (a) counsel for Flowers will be
11 in trial from June 8-19, and (b) Ms. Romero intends to serve a new notice under the CLRA and,
12 thus, the stipulated extension will permit her to add the CLRA claim and prayer for damages to
13 the First Amended Complaint after the expiration of the notice period, rather than filing a First
14 Amended Complaint on June 5 and then seeking leave to amend thereafter.

15 THEREFORE, Flowers and Ms. Romero stipulate that Ms. Romero's time to file the First
16 Amended Complaint is extended to and including July 6, 2015.

17 Dated: June 3, 2015

CROWELL & MORING, LLP

18 By: /s/ Joel D. Smith

19
20 Joel D. Smith
Attorneys for Defendant
Flowers Bakeries, LLC

21
22 Dated: June 3, 2015

COUNSELONE, P.C.

23 By: /s/ Anthony Orshansky

24 Anthony Orshansky
Attorneys for Plaintiff
25 Kelly Romero
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[PROPOSED ORDER]

PURSUANT TO STIPULATION, IT IS SO ORDERED,

Date: _____

Hon. Beth Labson Freeman
United States District Judge

I, Joel D. Smith, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of the document has been obtained from each of the other signatories.

By: /s/ Joel D. Smith
Joel D. Smith